

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

HECTOR LUIS PENA DE LEON
a/k/a HECTOR LUIS PENA

DEBTOR

CASE NO. 17-06462 BKT

CHAPTER 13

APPLICATION FOR LEAVE TO RETAIN REALTOR

TO THE HONORABLE COURT:

COMES NOW, HECTOR LUIS PENA DE LEON, the Debtor in the above captioned case, through the undersigned attorney, and respectfully states and prays as follows:

1. The Debtor seeks to employ, Rafael C. Jimenez-Santana of Hope Realty PR, Portales de Parque Escorial Apt 1401 Carolina Puerto Rico 00987, to procure the sale of a real property pertaining to the bankruptcy estate located at: Haciendas de Canovanas 56 Picaflor Street Canovanas Puerto Rico 00729.
2. Rafael C. Jimenez-Santana will be responsible of all selling and marketing efforts and will conduct the sales of the property in accordance to the notice of sale to be filed with the Court.
3. To the best of the Debtor's knowledge, the professional whose employment is sought has no connection with the Trustee, the Debtor, the creditors, any parties in interest, their respective attorneys or accountants, the Office of the US Trustee or any person employed by said Office.
4. The Debtor further believes that in the discharge of Mr. Jimenez-Santana's duties, the firm and its representative(s) will not hold any interest adverse to the herein Estate and will be a disinterested person as defined by 11 U.S.C. §§101 (14), 327.

Page -2 -

**Application to Employ Professional
Case no. 17-06462 BKT13**

5. The proposed realtor will be paid for its services as follows: In the event of a sale procured by Jimenez-Santana/Hope Realty PR, in compliance with the terms, conditions, and minimum price detailed in the notice of sale, Jimenez-Santana/Hope Realty PR will receive a commission at the rate of 4% of the gross sales price. These commissions are to be paid by the Estate, after notice and allowance by the Court.

WHEREFORE, the Debtor respectfully requests an Order authorizing the Debtor to retain the services of Rafael C. Jimenez-Santana of Hope Realty PR, to act as Realtor for the Debtor in the sale of a real property located at: Haciendas de Canovanas 56 Picaflor Street Canovanas Puerto Rico 00729., and for any further relief this Court deems just and proper under the circumstances.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I HEREBY CERTIFY that a copy of this motion was filed with the Court using the CM/ECF filing system which will send copy of the same to all CM/ECF participants including to: Jose Ramon Carrion Morales, Esq., Chapter 13 Trustee and to the U.S. Trustee's Office, Monsita

Page -3 -

**Application to Employ Professional
Case no. 17-06462 BKT13**

Lecaroz Arribas, Esq., Assistant US Trustee; I also certify that a copy of this motion was sent to the Debtor Hector Luis Peña de Leon, PO Box 788 Saint Just PR 00988 and to all creditors and all parties in interest (non-participants of CM/ECF system) as per mailing matrix attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico this 17th day of August, 2018.

/s/ Hector Luis Peña de Leon
HECTOR LUIS PEÑA DE LEON

/s/ Roberto Figueroa Carrasquillo
USDC-PR #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

HECTOR LUIS PENA DE LEON

DEBTOR

CASE NO. 17-06462/BKT
CHAPTER 13

STATEMENT UNDER PENALTY OF PERJURY
PURSUANT TO LBR-DPR 2014-1

I, Rafael C. Jimenez Santana, Realtor, declare under penalty of perjury as follows:

1. That I am a Realtor duly licensed by the Commonwealth of Puerto Rico.
2. That I am the Realtor for Debtor in the sale of a real property located at: Hacienda de 56 Picaflor Street, Canovanas Puerto Rico 00729. Which property is property of the Estate in the above captioned bankruptcy case, and I am the Realtor the Debtor is seeking to employ by the application to which this Declaration is attached as Exhibit #1.
3. That I have experience in the sales and leasing of residential real properties, that I am qualified to serve as Realtor to the herein Debtor and I am willing to accept employment on the basis set forth in the application.
4. That my office is located at: Condominio Parque Escorial Apt 1401, Carolina Puerto Rico 00987.
5. That to the best of my knowledge I nor any member of Hope Realty PR, holds or represents any interest adverse to the estate of the above-named Debtor and I am and each member of Hope Realty PR, a "disinterested person" as defined in 11 U.S.C. §101(14), nor I am nor my firm, to the best of my knowledge, related or otherwise connected with Debtor, the United States Trustee, the Debtor, counsel or any person employed by the Office of the United States

Page -2-
Hector Luis Pena De Leon
Caso no. 17-06462/BKT13

Trustee or to any other party interest.

6. That there is no agreement to share, except any members of Hope Realty PR, the compensation to be paid for the services rendered in this case, that I will amend this statement immediately upon the learning that: (a) any of the representation made herein is incorrect, or (b) there is any change of circumstance relating thereto, and that I have reviewed the provisions of LBR 2016-1.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 17th day of August, 2018.

/s/Rafael C. Jimenez Santana
RAFAEL C. JIMENEZ SANTANA, REALTOR
PORTALES DE PARQUE ESCORIAL APT 1401
CAROLINA PR 00987
TEL. 787-421-0180

Rafael C. Jiménez Santana

Portales de Parque Escorial apt 1401 Carolina PR 00987

787-421-0180

Objetivo

Trabajar en donde pueda aportar con mis conocimientos al desarrollo y éxito de la empresa.

Experiencia

Hospital San Francisco

1987-2004

Oficial de Salud y Seguridad Ocupacional — a cargo del Programa de Salud y Seguridad Ocupacional del Hospital y entre otras funciones que me fueron delegadas estaba la supervisión del contrato de servicios ambientales, cuadro telefónico y los servicios de mantenimiento.

J&M Services Inc.

2005

Gerente —a cargo de la planificación e inspección de los proyectos. Realizar las compras, cuadre de nómina, inspecciones a la planta física y orientación al personal.

ProManage PR, Corp

2011 hasta el presente

Administrador de Condominios Residenciales y Comerciales —a cargo de la administración de condominios, supervisión del personal de limpieza y mantenimiento, de las construcciones y mejoras dentro de las facilidades, depósitos y pagos de cuotas de mantenimiento y contabilidad. Velar porque los servicios contratados como: control de acceso, bombas de agua, recogido de basura, fumigación se proveyeran para el buen funcionamiento del condominio.

HoperealtyPR

2015 hasta el presente

Corredor de Bienes Raices

Educación

Universidad del Este, Bachillerato en Contabilidad

Cursando el tercer año conducente al Bachillerato en Contabilidad

Curso Corredor de Bienes Raices, Intituto Faria Realestate. Lic 18085 otorgada el 5 de enero de 2015. Fecha de vencimiento 16 de octubre de 2018.

Habilidades

Trabajo en equipo, capaz de trabajar con poca o ninguna supervisión, centrado en las metas, conocimiento en Microsoft Office, buen manejo de computadoras, excelente asistencia y puntualidad, leal a la empresa.

Referencias

Serán presentadas a su solicitud